IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS (DALLAS DIVISION)

IN RE:	§	
	§	CHAPTER 11
NATIONAL RIFLE ASSOCIATION	§	
OF AMERICA and SEA GIRT LLC,	§	CASE NO. 21-30085-hdh-11
	§	
DEBTORS. 1	§	JOINTLY ADMINISTERED
	8	

DECLARATION OF SONYA ROWLING WITH RESPECT TO MMP'S MOTION FOR AN ORDER REQUIRING THE UNITED STATES TRUSTEE TO RECONSTITUTE THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS |Dkt. 164|

- 1. I, Sonya Rowling submit this declaration relevant to MMP's Motion for an Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors [Dkt 164] (the "Motion") filed in the above referenced case.
- 2. I am the current Interim CFO of the National Rifle Association of America (the "Company"). I am familiar with the matters set forth herein, and unless otherwise noted, I have personal knowledge of the matters set forth herein. If called upon to testify, I would testify as follows:

TESTIMONY

3. On January 15, 2021, the Company filed its Voluntary Petition with this Court. I have reviewed the Official Form 204 (20 Largest Unsecured Creditors list) filed by the Company on that same date, a copy of which is attached as Exhibit D to that Motion. All of the creditors listed on that 20 Largest Unsecured Creditors are vendors with claims against the Company.

The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

4. The claim of Ackerman McQueen, Inc., is a disputed claim, but Ackerman McQueen, Inc. is on the Official Committee of Unsecured Creditors (the "OCC"). There are at least 17 undisputed vendor claimants on that list, only two of which are members of the OCC in this case.

5. The Pension Benefit Guaranty Corporation (the "**PBGC**") is on the OCC, but the Company does not have any terminated plans that are guaranteed by the PBGC. The Company does not dispute that it is possible the PBGC has a contingent claim against the Company.

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Pursuant to 28 U.S.C. § 1746, I, Sonya Rowling, declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Dated: February <u>23</u>, 2021

Sonya Rowling